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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

STATE OF CALIFORNIA, et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

Case No. 4:25-cv-04966-HSG

**STIPULATION AND [PROPOSED]
ORDER TO EXCEED PAGE
LIMITATIONS FOR MOTION TO
DISMISS**

1 Pursuant to Civil Local Rules 7-4(b) and 7-12, the parties submit this Stipulated Request
2 to permit the parties to file briefs in excess of the page limitations set forth in Civil Local Rule 7-
3 4(b). Specifically, Defendants seek to file a 30-page motion to dismiss the amended complaint
4 and Plaintiffs seek to file a 30-page opposition. The parties respectfully request that the Court
5 enter an order accordingly.

6 1. Defendants previously moved to dismiss the original complaint. Dkt. No. 118.

7 2. In response, Plaintiffs notified Defendants on September 24, 2025 that they
8 intended to amend their complaint pursuant to Federal Rule of Civil Procedure 15(a)(1).
9 Plaintiffs also notified the Court and all parties of this intent in their response to Defendants'
10 motion to dismiss, filed October 3, 2025. Dkt. No. 151.

11 3. On October 10, 2025, Plaintiff States filed their amended complaint. Dkt. No.
12 157.

13 4. On October 22, 2025, the parties filed a stipulation and proposed order setting out
14 a briefing schedule for Defendants' anticipated motion to dismiss in the event the Court did not
15 grant Defendants' motion to stay the case during the pendency of the government shutdown.
16 Dkt. No. 161. The Court entered the order regarding the proposed schedule, absent further order
17 of the Court, the following day. Dkt. No. 162.

18 5. Pursuant to the parties' stipulation and Court order, Defendants' motion to
19 dismiss is currently due on November 17, 2025. Dkt. No. 162.

20 6. In light of the many issues of administrative and constitutional law raised by
21 Plaintiffs' amended complaint, Defendants seek five pages in excess of the limitations set forth
22 in Civil Local Rule 7-4(b), or 30 pages total. Plaintiffs consent to Defendants' request on the
23 condition that they are also afforded five additional pages so that the opening and opposition
24 briefs remain subject to equal length requirements. Defendants consent to Plaintiffs' condition.

25 7. Accordingly, the parties respectfully request that the Court permit Defendants to
26 file a 30-page motion to dismiss the amended complaint and Plaintiffs to file a 30-page
27 opposition to Defendants' motion.
28

1 Dated: November 13, 2025

Respectfully submitted,

2 /s/ Jeffrey Hughes

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In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests that each signatory has concurred in the filing of this document.

[PROPOSED] ORDER

PURSUANT TO STIPULATION, it is so ordered.

Dated: _____, 2025

THE HONORABLE HAYWOOD S. GILLIAM, JR.
United States District Judge